IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

THE UNITED STATES OF AMERICA) CASE NO. 5:22 CR 00485
Plaintiff)) JUDGE DONALD C. NUGENT)
vs.) MOTION TO SUPPRESS STOP,
CARLOS PERDUE	DETENTION, ARREST ANDEVIDENCE AND STATEMENTS(Hearing Requested)
Defendant)

Now comes the defendant, by and through Counsel, and moves this Honorable Court for an Order suppressing the unconstitutional stop and evidence illegally obtained by the Government for the reasons set forth in the accompanying brief. Said suppression is requested for the following:

All evidence and statements obtained directly or indirectly from the initial stop of the defendant and from searches and seizures of the defendant, on the ground that said stop, searches and/or seizures were conducted without a warrant, without reasonable suspicion or probable cause and not incident to a lawful arrest.

Defendant requests an evidentiary hearing of this Motion.

Respectfully submitted,

/s/ James A. Jenkins

James A. Jenkins (0005819) 55 Public Square, Suite 2100 Cleveland, Ohio 44113

216/363-6003

Facsimile: 216/363-6013

E-Mail: jajenkins49@hotmail.com